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UNITED STATES DISTRICT COURT  
 FOR THE DISTRICT OF OREGON

NEW MEDIUM LLC, AV  
 TECHNOLOGIES LLC, J. CARL  
 COOPER, PIXEL INSTRUMENTS  
 CORPORATION, IP INNOVATION LLC,  
 and TECHNOLOGY LICENSING  
 CORPORATION,

Plaintiffs,

v.

BARCO N.V., MIRANDA  
 TECHNOLOGIES, TOSHIBA  
 CORPORATION, TOSHIBA AMERICA  
 CONSUMER PRODUCTS, L.L.C., and  
 SYNTAX-BRILLIAN CORPORATION,

Defendants.

Misc. No. 3:07-mc-09201  
 Civil Action No. 05 C 5620\*

\*In the United States District Court For the  
 Northern District of Illinois, Eastern  
 Division

Judge Amy St. Eve  
 Magistrate Judge Cole

JURY TRIAL DEMANDED

MOTION FOR LEAVE TO FILE UNDER  
 SEAL EXHIBITS 6, 8, AND 9

Plaintiffs IP Innovation LLC, and Technology Licensing Corporation (collectively "Plaintiffs") hereby respectfully requests that the Court grant their MOTION FOR LEAVE TO FILE UNDER SEAL the accompanying EXHIBITS 6, 8, AND 9 IN SUPPORT OF

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PLAINTIFFS' MEMORANDUM IN OPPOSITION OF NON-PARTY PIXELWORKS, INC.'S  
MOTION TO QUASH DEPOSITION SUBPOENA AND MOTION FOR SANCTIONS.

In support of this Motion, Plaintiffs state as follows:

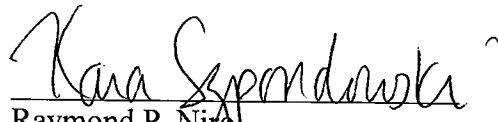
1. The parties to this proceeding are subject to a Protective Order regarding certain Confidential information, which order was entered by the Court on August 28, 2006 and provides, among other things, that if a party wishes to use any confidential information in Court papers, such confidential information shall be maintained under seal by the clerk.

2. The papers submitted herein contain information that has been designated as "attorney eyes only" by defendant Syntax-Brilliant Corporation. Specifically, Exhibit 6 is a Declaration by a Pixelworks employee, describing functionality in Pixelworks video processing chips. Exhibit 8 is Syntax-Brilliant Corporation's Confidential First Supplemental Response to Plaintiff's First Set of Interrogatories (excluding exhibits). Exhibit 9 is four pages of confidential deposition testimony of Syntax-Brilliant Corporation's 30(b)(6) witness, Sam Miller.

3. Therefore, Plaintiffs respectfully request leave to file the confidential information under seal with the Court.

4. Redacted versions of Exhibits 6, 8, and 9 have been submitted for filing with TLC's Memorandum in Opposition.

Respectfully Submitted,



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LLC, and TECHNOLOGY LICENSING  
CORPORATION

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that a copy of the foregoing **PLAINTIFFS' MOTION FOR LEAVE TO FILE UNDER SEAL EXHIBITS 6, 8, AND 9** has been served via First Class Mail on the below-listed counsel of record on the 6<sup>th</sup> day of September 2007:

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